

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

GREGORY BOYER, as Administrator of the
Estate of Christine Boyer, and on his own behalf,

Plaintiff,

v.

Lead Case No. 20-CV-1123

**ADVANCED CORRECTIONAL
HEALTHCARE, INC., et al.,**

Defendants.

GREGORY BOYER, as Administrator of the
Estate of Christine Boyer, and on his own behalf,

Plaintiff,

v.

Case No. 22-CV-723

**USA MEDICAL & PSYCHOLOGICAL
STAFFING, et al.,**

Defendants.

DEFENDANTS' PROPOSED VOIR DIRE QUESTIONS

Defendants Advanced Correctional Healthcare, Inc., USA Medical & Psychological Staffing, S.C., Lisa Pisney and Amber Fennigkoh submit the following Proposed Voir Dire Questions to be used at trial.

1. Does anyone have any family members who are attorneys or work in the justice system?
2. Does anyone have a personal or friendly relationship with an attorney or someone who works in the justice system?

3. The evidence will demonstrate that the plaintiff, Greg Boyer, is a veteran of the Army National Guard. Does anyone have family members or close relationships who are military veterans or on active duty? Does anyone believe that fact will influence your view of his testimony or any other evidence in the case, whether positively or negatively?

4. You'll hear evidence of an alleged firearm offense that led to a person's arrest. Do any of you possess handguns or recreational rifles? Does anyone believe that their own views on firearms will influence their view of the evidence in the case, whether positively or negatively?

5. Have you or a close family member had an experience or experiences with the criminal justice system where you or that family member have not been treated fairly? Would those experiences with the criminal justice system impact your ability to listen to the evidence in this matter and judge the defendants fairly and impartially?

6. Does anyone hold the opinion that law enforcement officers are often untruthful? Has anyone had an experience in which you felt that a law enforcement officer was untruthful?

7. Does anyone work with or deal with law enforcement, correctional officers, or prisoners/inmates, convicted people, people accused of or charged with crimes?

8. This is a personal question and you do not have to answer in front of everyone here. If you can answer yes to this question, and you'd like to tell the court in private, we can do that. Has anyone here ever been arrested? Has anyone ever spent time in jail or prison?

9. Has anyone had a negative experience when dealing with the Monroe County Sheriff's Department or Monroe County Jail?

10. Has anyone had a negative experience when dealing with any other sheriff's department or jail staff at any other facility?

11. Does anyone hold views on the correctional system in general such that you would tend to view the testimony of an officer or other person associated with a jail with doubt or skepticism?

12. Is anyone familiar through media exposure or other sources of events at Wisconsin correctional facilities in which it was reported that inmates there were treated poorly or not given appropriate medical treatment? What sources? [Follow up to discern bias, prejudice, or exposure to facts through sources other than evidence].

13. The evidence will demonstrate that the defendants are a registered nurse, a nurse practitioner, and their employer. Are any members of the panel trained in healthcare or have you worked in a healthcare-related position?

14. Has anyone had an experience with a nurse practitioner in which you believed the nurse practitioner was inadequately trained or licensed to perform the tasks necessary?

15. Does anyone have sufficient experience or training in medicine or nursing such that they believe it would be hard to set aside their own training and listen to the evidence and opinions of expert witnesses who will testify in the case?

16. One of the defendants is a private corporation that was contracted to provide medical and nursing services at the Monroe County Jail. Does anyone have strong opinions, whether positive or negative, about the use of private contractors to provide nursing or other healthcare services in a correctional facility?

17. Has anyone experienced the loss of a family member who was under the care of a medical professional? If so, please describe the circumstances.

18. This case involves an individual who suffered from congestive heart failure and persistent high blood pressure, do any of you have or know anyone who has congestive heart failure or persistent high blood pressure?

19. This case involves a woman who experienced chest pain, has any one experienced chest pain and, subsequently sought treatment at an Emergency Department?

20. Does anyone feel on the basis of the information known to them at this time that they could not be fair and impartial in this case for any other reason?

Dated this 1st day of August, 2025.

LEIB KNOTT GAYNOR LLC

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